

# EXHIBIT 6

LISA M. HOLLIDAY, Ph.D. - APRIL 13, 2018  
IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

SEAN SMITH and CRYSTAL SMITH, )  
                                       )  
Plaintiffs,                         )  
                                       )  
VS.                                 ) No. 5:17-CV-1302D  
                                       )  
CSAA FIRE AND CASUALTY             )  
INSURANCE COMPANY,                 )  
                                       )  
Defendant.                         )

\* \* \* \* \*

DEPOSITION OF LISA M. HOLLIDAY, PH.D.,  
TAKEN ON BEHALF OF THE PLAINTIFFS  
ON APRIL 13, 2018  
IN OKLAHOMA CITY, OKLAHOMA  
COMMENCING AT 9:53 A.M.

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REPORTED BY: KORTNEY V. HOUTS, CSR

<p style="text-align: center;">Page 26</p> <p>1 STEM. And I was in a calculus class in Tuttle, 2 Oklahoma, working with students there. 3 Q She's actually from Tuttle. 4 THE WITNESS: Are you from Tuttle? 5 THE COURT REPORTER: I am. 6 THE WITNESS: Yes. Did you take calculus? 7 THE COURT REPORTER: No. 8 THE WITNESS: No. 9 Q (By Mr. Engel) What is STEM? 10 A STEM is an acronym for Science Technology Engineering and Math. And the National Science Foundation is worried that not enough students are studying those topics. 14 Q I didn't write this question down. But it just hit me that Rimkus reached out to you when they were looking for an engineer. Is that correct? 17 A Correct. 18 Q You weren't looking for this -- is this a part-time job for you? 20 A It's full-time now. 21 Q Okay. So you're full-time working for Rimkus? 23 A Yes. 24 Q Okay. But Rimkus reached out to you? 25 A They did.</p>	<p style="text-align: center;">Page 28</p> <p>1 A Of 2017, this past August. 2 Q I was thinking about when my report was from 3 A Okay. 4 Q Okay. 5 A It might have been late July, but I'm thinking August. 7 Q Okay. When you go to work for Rimkus, did they have any formal training? 9 A Yes. 10 Q Tell me about that. 11 A It was a lot about their computer systems and how to log your time and how to log your hours and -- 13 Q The software that they use? 14 A Yes. It was a lot about how to write reports, the formats. 16 Q Is that a -- is that a PowerPoint slide or, like, a prerecorded show you're watching or movie? Video, I guess, is -- 19 MR. FELTY: Object to the form. 20 Q (By Mr. Engel) -- what people call it now. 21 A It was some of both. So they had little videos about how to -- how to go and investigate and get all of the information. So they had training videos, and then they also had booklets that you could read. And then we had a meeting with the -- with the</p>
<p style="text-align: center;">Page 27</p> <p>1 Q How did that happen? 2 A I don't know. They sent me an e-mail. And I 3 was ready to leave the university, and I thought, well, 4 that sounds interesting. Yeah. I don't know how they 5 found me. 6 Q Your dissertation? 7 A I don't know. 8 Q So when you graduate in 2009 with your Ph.D., what are you doing from then on? 10 A I was a professor. 11 Q So full-time professor? 12 A (Witness nods head affirmatively.) 13 Q Until -- 14 MR. FELTY: You've got to answer audibly. 15 THE WITNESS: Oh, sorry. Yes. Sorry. 16 Q (By Mr. Engel) Until -- 17 A I'm still -- until May 15th of this year. 18 Q Okay. And then did you have any other engineering jobs besides the Rimkus job between those times? 21 A No. 22 Q Okay. And when did you start working for Rimkus? 24 A August. 25 Q Of --</p>	<p style="text-align: center;">Page 29</p> <p>1 office manager. 2 Q What are the topics of the training videos? 3 A I mean, it was everything from HR, you know, all the corporate typical training. And then I believe there was some about, you know, working with customers and being professional and all that kind of stuff that you shouldn't have to tell people, but you do. 8 Q Of course. What about -- and some of that's about writing the reports. Correct? 10 A Correct. 11 Q What's the name of the software they use to write their reports? 13 A Microsoft Word. 14 Q Advanced. 15 A It comes in a Word. 16 Q What about -- were there videos specific to forensic engineering? 18 A There was. There weren't about buildings. But, for instance, the one that I saw about forensics was about investigating a car crash. 21 Q Were there any other ones that you watched when you were getting the job at Rimkus? 23 A Any other what? 24 Q Videos -- training videos about forensic engineering.</p>

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<p>1       Q   Earthquake?</p> <p>2       A   No.</p> <p>3       Q   What kind of claim was it?</p> <p>4       A   It was a tree fell on it.</p> <p>5       Q   Did they hire engineers on that claim?</p> <p>6       A   They didn't.</p> <p>7       Q   Was it CSAA?</p> <p>8       A   It was not.</p> <p>9       Q   Moving on. Now that you're doing this forensic engineering, do you understand the importance of the reports that you're writing?</p> <p>10      A   I understand -- yes. I understand the importance of all of my engineering work.</p> <p>11      Q   Well, specific to Rimkus, ma'am.</p> <p>12      A   Specific -- every -- engineering has a great deal of responsibility, and I realize that.</p> <p>13      Q   And you understand that your determinations on cause of loss dictate coverage. Correct?</p> <p>14      MR. FELTY: Object to form.</p> <p>15      THE WITNESS: I focus on the engineering.</p> <p>16      Q   (By Mr. Engel) But isn't it your understanding that the insurance companies are hiring you to determine the cause of loss and some of those causes of loss are covered causes of loss and some of those are not covered causes of loss?</p>	<p>1       A   I don't go there. That's not part of my job.</p> <p>2       Q   Okay. So you're going to say you don't -- if I was to tell you that your cause of loss determinations are what they're using to dictate coverage, that would be something that you are unfamiliar with?</p> <p>3       A   The specifics of, yes. I'm not familiar with that.</p> <p>4       Q   Right. So you're going to say that you don't know whether or not settling or improper construction is covered. Correct?</p> <p>5       A   Correct.</p> <p>6       Q   And you're going to stay out of all of these -- my pages of insurance questions where I'm asking you about insurance coverage, you don't understand any of that?</p> <p>7       A   I don't even want to know about it.</p> <p>8       Q   Fair enough. But as far as what you're being hired to do, the determination of cause of loss is something that dictates coverage.</p> <p>9       MR. FELTY: Object to form. Asked and --</p> <p>10      Q   (By Mr. Engel) Is that your understanding?</p> <p>11      MR. FELTY: Asked and answered.</p> <p>12      You can answer again.</p> <p>13      THE WITNESS: Okay. Do I answer again?</p>
<p>1       A   I focus strictly on the engineering.</p> <p>2       Q   I know. But are you going to say that you don't have an understanding that that's why they hired an engineer?</p> <p>3       A   I do. But I really focus on the engineering.</p> <p>4       Q   Sure. And you focus on, you know, whatever they've assigned you to do in your engineering. But it's your understanding that Rimkus is hired because they want -- the insurance carriers or your clients --</p> <p>5       A   Want our engineering opinion.</p> <p>6       Q   As to what the cause of loss is because --</p> <p>7       A   As to what -- yes.</p> <p>8       Q   -- because the cause of loss can dictate the insurance coverage. Correct?</p> <p>9       A   I'm going to take your word for it.</p> <p>10      Q   Well, that's what I'm asking you. Like, you don't have a feel for that at all?</p> <p>11      A   I really don't.</p> <p>12      Q   And so do you think that Rimkus is just hired by insurance companies so they can get your engineering opinion, or what do you think the purpose is behind it?</p> <p>13      A   Yes. And then they -- I realize they make decisions based on our engineering opinions.</p> <p>14      Q   And what are those decisions? What do you think those decisions are?</p>	<p>1       MR. FELTY: Same answer --</p> <p>2       THE WITNESS: I understand decisions are made on my engineering decisions, on my engineering opinions.</p> <p>3       Q   (By Mr. Engel) And so you take that very seriously, wouldn't you?</p> <p>4       A   I take everything I do very seriously.</p> <p>5       Q   Some of these are multimillion-dollar losses where people have damage to their structures, and your determination can dictate whether or not their insurance company pays them?</p> <p>6       MR. FELTY: Object to form.</p> <p>7       MR. ANDREWS: Object to the form.</p> <p>8       Q   (By Mr. Engel) You may answer.</p> <p>9       A   Correct. Engineering has -- has a lot of responsibilities. When I was a design engineer, it was safety. It's people's lives. I take my engineering responsibilities very seriously.</p> <p>10      Q   But now it's insurance claims?</p> <p>11      A   Now it's --</p> <p>12      MR. FELTY: Object to form.</p> <p>13      THE WITNESS: Now it's engineering opinions.</p> <p>14      Q   (By Mr. Engel) Would you say that all of your inspections at Rimkus have to do with insurance claims whether you are hired by an insurance company o</p>

<p style="text-align: center;">Page 242</p> <p>1 A Not from me, they don't.      2 Q Is there anything else I need to know about      3 your involvement in this investigation or claim?      4 A I can't think of anything.      5 MR. ENGEL: Let me look at my notes off the      6 record for a little bit and take a little bit of a      7 break.      8 MR. FELTY: Yeah. Take five.      9 (A break was taken.)      10 MR. FELTY: Back on the record.      11 Q (By Mr. Engel) Ms. Doc Holliday, you're back      12 on the record, ma'am.      13 A Okay.      14 Q One of the things that you say in your report      15 is that things are out of plumb. Did you take any      16 measurements of this out of plumb?      17 A Not numeric measurements. Just with a level.      18 Q And that's a four-foot level?      19 A Yes.      20 Q What areas did you measure?      21 A We measured the floors and the walls.      22 Q Okay. Which walls?      23 A Outsidess of the walls.      24 Q All four sides of the residence on the      25 outside?</p>	<p style="text-align: center;">Page 244</p> <p>1 professors that were -- had been around for longer than      2 I had, and they didn't seem all that happy. And so I      3 decided to make a change, do something different, shake      4 it up a little bit.      5 Q Now, is that before or --      6 A That was an earthquake joke.      7 Q That was good.      8 MR. ANDREWS: That was on the record. That      9 was a good one.      10 THE WITNESS: Yes.      11 Q (By Mr. Engel) Is that -- was that before or      12 after Rimkus -- did you -- had you made this decision      13 before or after Rimkus had reached out?      14 A I was -- about the same time. The timing was      15 right.      16 Q Does the Rimkus gig pay more?      17 A Oh, yes. I mean, the teachers are on strike.      18 Q I understand.      19 A We don't value education in this state.      20 Q Is the Rimkus thing -- is that a -- is that a      21 stepping stone to something else that you have in mind      22 or is that like a full-time, this is where I'm going to      23 be for the next 15 years, kind of thing?      24 A I don't -- I don't know. I'm not sure. It's      25 not -- I don't have a -- I don't have another job in</p>
<p style="text-align: center;">Page 243</p> <p>1 A Probably.      2 Q Okay.      3 A Tim had the level.      4 Q Did you do those measurements or did Tim?      5 A Tim did.      6 Q So you're leaving OU now?      7 A I am.      8 Q And you're moving to a full-time position at      9 Rimkus?      10 A I am.      11 Q When you were going to get your Ph.D. -- and      12 it sounds like specializing in earthquake structure      13 design, if you will. Right?      14 A Right.      15 Q What were you planning on doing with that      16 specialty?      17 A I did not have a plan.      18 Q Did you have any idea of what you were going      19 to be?      20 A I thought I'd be a professor for the rest of      21 my life.      22 Q When did that shift?      23 A You know, I got -- I just -- right before I      24 went to work with Rimkus, I looked at -- I had gotten      25 tenure and everything was going well, and I looked at</p>	<p style="text-align: center;">Page 245</p> <p>1 mind or another plan.      2 Q And you've been with them for less than a      3 year?      4 A Less than a year.      5 Q And you understand that the majority of your      6 work is going to be writing reports for insurance      7 companies. Right?      8 MR. FELTY: Object to the form.      9 Argumentative.      10 MR. ANDREWS: Same objection.      11 THE WITNESS: There's a lot of report      12 writing, and nobody becomes an engineer because they      13 like to write.      14 Q (By Mr. Engel) But a lot of these reports      15 you're going to be writing, they're for insurance      16 companies. Right?      17 MR. FELTY: Same objection.      18 THE WITNESS: It seems so.      19 Q (By Mr. Engel) Rimkus is going to be      20 utilized by insurance companies to possibly deny      21 coverage to the people of Oklahoma through your      22 determinations of cause of damage.      23 MR. ANDREWS: Object to the form.      24 Q (By Mr. Engel) Is that something that you're      25 comfortable with?</p>

<p style="text-align: center;">Page 246</p> <p>1       A I'm comfortable making engineering decisions, 2 and if that leads to policy decisions, I'm sorry if it 3 doesn't go the way people want. But I'm going to do my 4 fair engineering assessment.</p> <p>5       <b>Q Do you find job satisfaction in what you do</b> 6 <b>for Rimkus?</b></p> <p>7       A I do.</p> <p>8       <b>Q Have you understood all the questions I've</b> 9 <b>asked you today?</b></p> <p>10      A I have.</p> <p>11      <b>Q Was I fair and polite to you?</b></p> <p>12      A And -- you were. And the questions I didn't 13 understand, we clarified at the time. So we have no 14 outstanding miscommunications.</p> <p>15      <b>Q I appreciate you, ma'am. Thank you very</b> 16 <b>much.</b></p> <p>17      A Thank you.</p> <p>18      <b>MR. ANDREWS: Would you grade him about a B?</b></p> <p>19      <b>THE WITNESS: Oh, let's give him an A. Come</b> 20 <b>on. Let's give him an A.</b></p> <p>21      <b>MR. ANDREWS: I have no questions.</b></p> <p>22      <b>MR. ENGEL: That's okay. Back in my law</b> 23 <b>firm, they always give me Ds.</b></p> <p>24      <b>THE WITNESS: No, they don't.</b></p> <p>25      <b>MR. FELTY: One thing we wanted to -- we're</b></p>	<p style="text-align: center;">Page 248</p> <p>1       the gist of my disagreement.</p> <p>2       <b>MR. FELTY: Yeah. So we'll brief the issue</b> 3 <b>for the Court. We would move for protective order that</b> 4 <b>any testimony elicited from Dr. Holliday be sealed</b> 5 <b>unless and until the Court rules on this issue and not</b> 6 <b>to be used for any other purpose over and beyond the</b> 7 <b>Smith versus CSAA case. Again, we'll just let that --</b> 8 <b>have to let the Court decide.</b></p> <p>9       <b>Dr. Holliday, you now have to say whether</b> 10 <b>you're going to read and sign your deposition or waive</b> 11 <b>it. My recommendation to you is to say, read and sign.</b></p> <p>12      <b>THE WITNESS: Okay. Read and sign.</b></p> <p>13      <b>MR. FELTY: All right. We're done.</b></p> <p>14      <b>(Deposition concluded at 3:48 p.m.)</b></p> <p>15      <b>(Total time on the record, 4 hours, 16 minutes)</b></p>
<p style="text-align: center;">Page 247</p> <p>1       going to move to seal Dr. Holliday's deposition to the 2 extent any testimony elicited from Dr. Holliday 3 pertaining to matters, one, outside the state of 4 Oklahoma; two, not involving an allegation of damage to 5 a residential structure involving seismicity; or, 6 three, training or associated questions concerning 7 non-seismicity issues.</p> <p>8       Unless and until we have an opportunity to 9 review the transcript, we won't know the page and line 10 of the testimony we'd like to seal. So we'll need to 11 wait until the transcript is available. But we would, 12 again, move to seal that part -- or those parts of her 13 deposition transcript.</p> <p>14      <b>MR. ANDREWS: No objection.</b></p> <p>15      <b>MR. ENGEL: I'm going to object. Her --</b> 16 <b>strictly on the basis that when she came in to Rimkus,</b> 17 <b>there's very little training provided. All of my</b> 18 <b>questions pertaining to her training at Rimkus and the</b> 19 <b>materials she received has to do with her experience as</b> 20 <b>a forensic engineer. And not only that, but now she's</b> 21 <b>a full-time forensic engineer for a company called</b> 22 <b>Rimkus. Rimkus, as demonstrated in her testimony,</b> 23 <b>doesn't provide any training to their engineers in</b> 24 <b>regards to being a forensic engineer. It sounds like</b> 25 <b>something that we'll be briefing later on, but that's</b></p>	